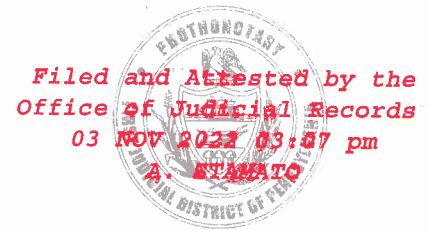


# EXHIBIT “A”

KAMENSKY, COHEN & RIECHELSON  
BY: KEVIN S. RIECHELSON  
I.D. #: 58960  
194 S. BROAD ST.  
TRENTON, NJ 08608  
609-394-8585  
609-394-8620 (F)  
[KRIEHELSON@KCRLAWFIRM.COM](mailto:KRIEHELSON@KCRLAWFIRM.COM)



NAOMI CARRERA : IN THE COURT OF COMMON PLEAS  
: PHILADELPHIA  
V. :  
: NO.  
AALIYAH MONET MONT, HIGH :  
PROOF LOGISTICS, LLC :  
AMAZON a/k/a AMAZON, INC, :  
a/k/a AMAZON LOGISTICS, :  
a/k/a AMAZON SERVICES, LLC, :  
a/k/a AMAZON CORP. AND/OR :  
JOHN DOES I-V and JOHN DOE :  
CORPORATIONS VI-X :

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association Lawyer Referral and  
Information Service One Reading Center  
Philadelphia, Pennsylvania 19107 (215) 238-6333  
TTY (215) 451-6197

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted. Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados De Filadelfia Servicio De  
Referencia E Informacion Legal One Reading Center  
Filadelfia, Pennsylvania 19107 (215) 238-6333 TTY  
(215) 451-6197

Court of Common Pleas of Philadelphia County  
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)	
<b>NOVEMBER 2022</b> E-Filing Number: 2211007822 <b>000567</b>	
PLAINTIFF'S NAME NAOMI CARRERA	DEFENDANT'S NAME AALIYAH MONET MONT
PLAINTIFF'S ADDRESS 261 S. OLDEN AVENUE TRENTON NJ 08629	DEFENDANT'S ADDRESS 3319 N. 20TH STREET PHILADELPHIA PA 19140
PLAINTIFF'S NAME	DEFENDANT'S NAME AMAZON, ALIAS: A.K.A. AMAZON CORP.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 2400 WECCACOE AVENUE PHILADELPHIA PA 19148
PLAINTIFF'S NAME	DEFENDANT'S NAME HIGH PROOF LOGISTICS, LLC
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 2016 DICKINSON STREET PHILADELPHIA PA 19146
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 3 COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:
CASE TYPE AND CODE 20 - PERSONAL INJURY - OTHER	
STATUTORY BASIS FOR CAUSE OF ACTION	
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) <div style="text-align: center;"> <b>FILED</b>  <b>PRO PROTHY</b>  <b>NOV 03 2022</b>  <b>A. STAMATO</b> </div>	
IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>NAOMI CARRERA</u> Papers may be served at the address set forth below.	
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY KEVIN S. RIECHELSON	ADDRESS 194 S BROAD ST TRENTON NJ 08608
PHONE NUMBER (609) 394-8585	FAX NUMBER (609) 394-8620
SUPREME COURT IDENTIFICATION NO. 58960	E-MAIL ADDRESS kriechelson@kcrlawfirm.com
SIGNATURE OF FILING ATTORNEY OR PARTY KEVIN RIECHELSON	DATE SUBMITTED Thursday, November 03, 2022, 03:07 pm

KAMENSKY, COHEN & RIECHELSON  
BY: KEVIN S. RIECHELSON  
I.D. #: 58960  
194 S. BROAD ST.  
TRENTON, NJ 08608  
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JOHN DOES I-V and JOHN DOE	:	
CORPORATIONS VI-X	:	

### COMPLAINT

1. At all times material hereto, plaintiff, Naomi Carrera, was an adult individual residing at 261 S. Olden Avenue, Trenton, New Jersey 08629.
2. At all times material hereto, defendant, Aaliyah Monet Mont, was an adult individual residing at 3319 N. 20<sup>th</sup> Street, Philadelphia, PA 19140, and was the driver of a Ram truck that was involved in a collision with the plaintiff's vehicle on December 24, 2020.
3. At all times material hereto, defendant, John Does I-V, were adult individuals, whose identities are unknown, who was/were the driver and/or owner and /or lessee of the vehicle that collided with plaintiff's vehicle on December 24, 2020.
4. At all times material hereto, defendants, High Proof Logistics, LLC, Amazon a/k/a Amazon, Inc., a/k/a Amazon Logistics, a/k/a Amazon Services, LLC, a/k/a Amazon

Corp., and/or John Doe Corporations VI-X were the employers of defendant, Aaliyah Monet Mont and/or John Does I-V, who were working in the course and scope of their employment with defendants at the time of the within accident.

5. On December 24, 2020, plaintiff was operating her vehicle and had stopped due to traffic conditions when suddenly and without warning, plaintiff's vehicle was struck from behind by defendant(s)' vehicle.
6. As a result of the impact of defendant(s)' vehicle and plaintiff's vehicle, plaintiff was injured.
7. Defendants were negligent in the operation of their vehicle, and caused the collision with the plaintiff.
8. Defendants were negligent in the operation of their vehicle in that they:
  - a. Failed to maintain their lane of travel;
  - b. Failed to stop for vehicles that were stopped in the roadway;
  - c. Failed to avoid a collision with the rear of plaintiff's vehicle
  - d. Failed to pay attention to the condition of traffic;
  - e. Failed to have their vehicle under control at all times;
  - f. Failed to maintain an assured clear distance from other vehicles on the roadway;
  - g. Failed to have their motor vehicle under proper and adequate control under the circumstances;
  - h. Failed to have due regard for the point and position of said motor vehicle containing the plaintiff;

- i. Violated of the statutes of the Commonwealth of Pennsylvania and local ordinances;
  - j. Otherwise failed to exercise due care under the circumstances;
  - k. Such other acts of carelessness and negligence as will appear in the course of discovery to be conducted pursuant to the Pennsylvania Rules of Civil Procedure at the time of trial in this case.
9. As a result of Defendant(s)' negligence and carelessness, Plaintiff suffered injuries to her head, shoulder, neck and back and suffered an exacerbation of pre-existing conditions. The injuries sustained are or may be serious, severe, and permanent.
10. As a result of Defendant's negligence and carelessness, Plaintiff has had to undergo medical treatment and continues to suffer from the injuries sustained in the accident; such injuries have caused and may continue to cause Plaintiff mental anguish and pain and suffering; such injuries have prevented and may continue to prevent Plaintiff from attending her usual activities and duties.
11. As a result of Defendant's negligence and carelessness, Plaintiff incurred medical bills that may be subject to a lien.
12. In addition, as plaintiff is not a resident of Pennsylvania, she is not subject to the PA.M.V.F.R.L. 1720 and 1722, and is entitled to recovery of her medical bills.
13. Defendants, Amazon a/k/a Amazon, Inc., a/k/a Amazon Logistics, a/k/a Amazon Services, LLC, a/k/a Amazon Corp., and/or John Doe Corporations VI-X, are vicariously liable for the acts and/or omissions of their employees, agents, servants and/or workmen, who were acting on their behalf, and in the course and scope of their employment, when their negligence caused the accident with the plaintiff's vehicle.

14. Defendants, Amazon a/k/a Amazon, Inc., a/k/a Amazon Logistics, a/k/a Amazon Services, LLC, a/k/a Amazon Corp., and/or John Doe Corporations VI-X, are liable under the theory of respondeat superior for the acts and/or omissions of their employees, agents, servants and/or workmen, who were acting on their behalf, and in the course and scope of their employment, when their negligence caused the accident with the plaintiff's vehicle.

**WHEREFORE**, Plaintiff, demands judgment against Defendant for compensatory damages, together with interest and costs of suit, in an amount in excess of \$50,000.

Law Offices of  
**KAMENSKY ♦ COHEN & RIECHELSON**

*Kevin Riechelson*

BY:

\_\_\_\_\_  
KEVIN S. RIECHELSON, ESQUIRE  
Attorney for Plaintiffs  
194 South Broad Street  
Trenton, New Jersey 08608  
(609) 394-8585

Dated: November 3, 2022



VERIFICATION TO COMPLAINT

Plaintiff verifies that the statements made in this Complaint are true and correct to the best of my knowledge. Plaintiff understands that false statements made herein are made subject to the penalties of 18 P.A.C.S., Section 4904, relating to unsworn falsification to authorities.

W

11-7-22